

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

THE KELLY FIRM, P.C.
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Interested Party, Blue Cross Blue Shield
of Massachusetts

In Re:

LTL MANAGEMENT, LLC.

Case No.: 23-12825

Chapter: 11

Judge: MBK

**APPLICATION FOR ADMISSION
PRO HAC VICE PURSUANT TO RULE 9010-1(b)**

Blue Cross Blue Shield of Massachusetts (BCBS), an interested party in the above referenced Chapter 11 case, hereby respectfully makes application to the United States Bankruptcy Court for the District of New Jersey (“this Court”), pursuant to Rule 9010-1(b), for the admission *pro hac vice* of Elizabeth Brannen Carter, Esq. (“Ms. Carter”) to serve as co-counsel for BCBS with Andrew J. Kelly, Esq. of The Kelly Firm, P.C. Andrew J. Kelly, Esq. has entered his appearance of record as local counsel on behalf of BCBS in this matter.

1. Ms. Carter is not licensed to practice in the state of New Jersey but wishes to appear in the above-captioned case and respectfully requests this Court to admit her *pro hac vice*. BCBS desires to have Ms. Carter involved in its representation.

2. Ms. Carter was counsel for BCBS admitted *pro hac vice* in the previous Chapter 11 case filed by LTL Management, LLC, Case No. 21-30589-MBK and represented BCBS as its

counsel on the Official Committee of Talc Claimants. Thus, Ms. Carter's knowledge and experience in this case make her indispensable in this firm's representation of BCBS.

3. If Ms. Carter is permitted to participate in this action, she understands that she will be subject to the disciplinary jurisdiction of this Court.

4. Andrew J. Kelly, Esq. will continue to act as local counsel on behalf of BCBS in this matter.

5. Attached hereto is the Certification of Ms. Carter, which is incorporated by reference herein.

6. Attached hereto is the Certification of Andrew J. Kelly, Esq., which is incorporated by reference herein.

7. Pursuant to Rule 9010-1(b), Notice of this Application has been provided to the Debtor and the United States Trustee.

WHEREFORE, BCBS requests that this Court grant the Application and that Ms. Carter be admitted *pro hac vice* in this matter.

Respectfully submitted,

THE KELLY FIRM, P.C.

Date: April 10, 2023

**By: /s/ Andrew J. Kelly
ANDREW J. KELLY
Attorneys for Interested Party,
BCBS of Massachusetts**